



August 3, 2021

VIA ECF

Hon. Joanna Seybert
United States District Judge
Eastern District of New York
100 Federal Plaza
Central Islip, New York 11722

Re: *Wilson v. County of Suffolk*; 21 Civ. 3716 (JS) (SIL)

Dear Judge Seybert,

I represent the plaintiff, Ron Wilson, in the above-referenced matter. This letter is submitted in response to the County's "Status Report", filed on July 28, 2021 and would have been filed sooner, but I was away from the office until today.

Notably, the County persists in its failure to defend its confiscation of private property under threat of arrest and prosecution. The County's letter makes no mention of which Penal Law section hundreds of law-abiding people are purportedly violating and no letter from the District Attorney's Office has surfaced promising immunity from the criminal prosecution threatened by the defendants in the form letters mailed out by the Suffolk County Police Department, DA Section – the latest batch dated July 28, 2021 – the same date as counsel's letter to the Court. (See attached).

Consistently represented to the district and circuit court in *John Does 1-10*, none of the plaintiffs surrendered their CT4-2A Other Firearms to Suffolk County. To the contrary, as outlined in Mr. Wilson's complaint, Suffolk County Police seized all of his CT4-2A Other Firearms in May 2021. Thus, having had his property seized in May 2021 – prior to the filing of the John Does 1-10 complaint in June 2021 - Mr. Wilson could not be, and is not, one of the John Doe plaintiffs.

Though similar, Mr. Wilson's case stands on its own. Mr. Wilson's property was taken from him by the defendants in violation of the Fourth, Fifth, and Fourteenth Amendments.

As far as the other superfluous information contained in the County's letter, the *John Does 1-10* matter will be addressed in the circuit court. Thank you for the Court's consideration.

Respectfully,

/s/

Amy L. Bellantoni

